

COUNTY OF MUSKEGON

Policy & Procedure Regarding Use and Disclosure of Social Security Numbers

I. Policy

All employees are required to have a Social Security Number in order to be employed by Muskegon County, so that the County can make adequate tax reporting and comply with other State and Federal reporting requirements. The County takes each employee's privacy very seriously, and maintains a strict policy to protect the confidentiality of Social Security Numbers that are obtained by or provided to the County and/or its employees, members, contractors, agents, and representatives in the course of their employment, activities, or services performed on behalf of the County.

Documents containing Social Security Numbers shall be kept in confidential files. Except as required by necessary and legitimate business purposes, no employee is permitted to have access to Social Security Numbers (including documents that contain any Social Security Numbers) or to keep, view, use, copy, disclose, or distribute another person's Social Security Number, or in any other way disclose another person's Social Security Number. Any employee who accesses a Social Security Number for necessary and legitimate business purposes is prohibited from using or accessing the Social Security Number in a manner that may permit an unauthorized individual to view, use, or access the number.

When documents containing Social Security Numbers are no longer needed and are to be discarded, such documents must be disposed of in a manner that ensures the confidentiality of the Social Security Numbers. The County will develop a practice for shredding, electronically deleting, or otherwise disposing of confidential records, including documents containing Social Security Numbers.

Violation of this policy will subject an employee to disciplinary action, up to and including discharge.

II. Procedure

A. Obtaining Social Security Numbers. Documents or other records containing Social Security Numbers are to be requested, obtained or created only for legitimate business reasons. Such reasons include, but are not limited to:

1. Applicants may be required to provide a Social Security Number for purposes of applicant tracking and pre-employment background check.

2. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment in accordance with the Immigration Reform and Control Act.
3. Social Security Numbers may be requested from employees for tax reporting purposes (e.g., IRS Form W-4), for new hire reporting, or for purposes of enrollment in the County's employee benefit plans.
4. Social Security Numbers may be obtained from contractors or vendors for tax-reporting purposes (e.g., IRS Form 1099).
5. Customer/clients/patients may be asked to provide Social Security Numbers for tax reporting purposes or for purposes of establishing a customer-specific account or other record.

B. Retention & Access to Social Security Numbers.

1. All records containing Social Security Numbers (whether partial or complete) will be maintained in secured files.
2. All paper records containing Social Security Numbers must be considered "Confidential".
3. Only personnel who have a legitimate business reason to know will have access to records containing Social Security Numbers.
 - (a) Employees whose jobs entail regular access to records containing Social Security Numbers will be advised about the legal requirements and the requirements of this Policy and Procedure.
 - (b) Where a record containing a Social Security Number is to be disseminated to persons outside the County, to persons within the County who are not authorized or were not advised about this Policy and Procedure, or where the number is not relevant to the purpose for which the record is being shared, the Social Security Number should be redacted or otherwise rendered unreadable.
4. Employees using records containing Social Security Numbers will take appropriate steps to secure such records when not in immediate use. Such steps may include:
 - (a) Placing records in a locked desk or file drawers when not in use.

- (b) Using password protection or screen-savers on computers and computerized records to prevent unauthorized access to or viewing of such records by others.
- 5. Inactive records containing Social Security Numbers will be retained in accordance with the requirements of state and federal laws and then destroyed in a manner that continues to ensure their confidentiality. For purposes of this Policy and Procedure, "inactive records" are those where there is no longer a current employment, supplier, customer/patient relationship.
- C. Unauthorized Use/Disclosure of Social Security Numbers. Any employee who obtains, uses or discloses Social Security Numbers for unauthorized purposes or contrary to the requirements of this Policy and Procedure shall be subject to discipline up to and including discharge. The County will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of individuals who obtain, use or disclose Social Security Numbers for unlawful reasons.

Social Security Number Policy & Procedure

I acknowledge receipt of the County of Muskegon Policy & Procedure Regarding Use and Disclosure of Social Security Numbers.

Employee Signature

Date

Department